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June 18, 2025

DELIVERED VIA ECF

Magistrate Judge Valerie Figueredo
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, New York 10007
(212) 805-0298
FigueredoNYSDChambers@nysd.uscourts.gov

Case Title: *Katharine Morling v. UCP International, et al.; 1:24-cv-04081*
Re: **Request to Extend Jurisdictional Discovery Deadline**

Your Honor:

This office represents Plaintiff Katharine Morling, in the above-referenced matter. We write to the Court to respectfully request an extension of the jurisdictional discovery deadline currently set for July 15, 2025 (Dkt. 42) for 30 days to August 14, 2025.

Good cause exists for this request. The parties have arranged to meet and discuss settlement at a neutral location in early July and thus wish to delay the continuing of discovery and the taking of depositions until after this conference to avoid incurring additional costs and fees that may affect their ability to reach a settlement.

In light of the foregoing, we respectfully request that the deadline for jurisdictional discovery be extended to August 14, 2025. UCP joins in this request. We thank Your Honor for its time and consideration.

Respectfully submitted,

By: /s/ David Michael Stuart Jenkins
David Michael Stuart Jenkins
DONIGER / BURROUGHS
Attorney for the Plaintiff

SO ORDERED.

Date: _____, 2025

Hon. Valerie Figueredo
United States Magistrate Judge